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Gibbs LLP, and Jordan Hyden, Womble and  
Culbreth P.C.*

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re:	Chapter 11
MOTORS LIQUIDATION COMPANY, et al.,	Case No.: 09-50026 (REG)
f/k/a General Motors Corp., et al.,	:
	:
Debtors.	(Jointly Administered)
	X

**AMENDED RESERVATION OF RIGHTS OF  
CERTAIN NON-ISD PRE-CLOSING ACCIDENT PLAINTIFFS**

Goodwin Procter, LLP, as counsel to Hilliard Muñoz Gonzales LLP, Thomas J. Henry Injury Attorneys, Girard Gibbs LLP, and Jordan Hyden, Womble and Culbreth P.C., which firms in turn represent the Non-Ignition Switch Pre-Closing Accident Plaintiffs<sup>1</sup> identified on Exhibit A hereto (the “Non-ISD Pre-Closing Accident Plaintiffs”), files this amended reservation of rights with respect to the Non-ISD Pre-Closing Accident Plaintiffs’ ability to seek to file late proofs of claim at a future date and seek recovery on such claims from the assets of the GUC

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<sup>1</sup> Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Judgment entered in the above-captioned chapter 11 case on June 1, 2015 [ECF No. 13177] (the “Judgment”).

Trust.<sup>2</sup> In its Decision on Motion to Enforce Sale Order the Court explained that it has deferred consideration of issues relating to Non-Ignition Switch Plaintiffs. *In re Motors Liquidation Co.*, 529 B.R. 510; 522 (Bankr. S.D.N.Y. 2015). Accordingly, the Non-ISD Pre-Closing Accident Plaintiffs hereby reserve the right to, at a future date, file and seek allowance of late claims, seek a recovery on such claims from the assets of the GUC Trust, and litigate issues (i) through (iii) identified in paragraph 13(a) of the Judgment.

Dated: June 24, 2015

Respectfully submitted,

/s/ William P. Weintraub  
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<sup>2</sup> Designated Counsel files this Amended Reservation of Rights to add five Non-ISD Pre-Closing Accident Plaintiffs who were inadvertently omitted from the initial filing [ECF No. 13252], which plaintiffs are separately listed on Exhibit A hereto.